

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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EDGAR TELESFORD,

Plaintiff,

-against-

NEW YORK CITY DEPARTMENT OF EDUCATION;
MALIK SMALL, PRINCIPAL OF EAST NEW YORK
MIDDLE SCHOOL OF EXCELLENCE; AND JOYCE
STALLINGS-HARTE, SUPERINTENDENT of
COMMUNITY SCHOOL DISTRICT 19,

Defendants.

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**DECLARATION IN
SUPPORT OF DEFENDANT
DOE'S MOTION FOR
JUDGMENT ON THE
PLEADINGS**

16 Civ. 819 (CBA)(SMG)

NATALIE S. MARCUS declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, attorney for defendant New York City Department of Education ("DOE") in the above-referenced action. This declaration is submitted in support of defendant's motion for judgment on the pleadings, pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, dismissing the Amended Complaint in its entirety. This declaration is based on the books and records of the City of New York and the DOE.¹

2. I am attaching to this declaration as Exhibit A is a true and correct copy of plaintiff's Charge of Discrimination, dated February 20, 2015, which was filed with the United

¹ DOE is formally the Board of Education of the City School District of the City of New York.

States Equal Employment Opportunity Commission (“EEOC”). This office received a copy by service on DOE.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
December 1, 2017

/s/Natalie S. Marcus

Natalie S. Marcus